

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

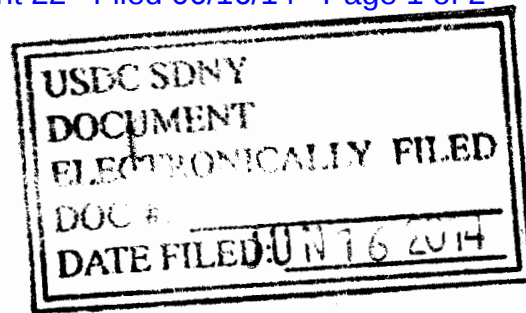
UNITED STATES OF AMERICA, *ex rel.*  
ALEX GRABCHESKI,

Plaintiff,

v.

AMERICAN INTERNATIONAL GROUP,  
INC.,

Defendant.



Case No.: 10-cv-3902 (GBD)

**[DRAFT] STIPULATION AND  
ORDER EXTENDING  
DEFENDANT'S TIME TO ANSWER  
OR MOVE WITH RESPECT TO  
COMPLAINT**

The undersigned attorneys for Relator Alex Grabcheski and Defendant American International Group, Inc. ("AIG") hereby stipulate and agree as follows:

1. The Complaint in this matter was served on AIG on May 23, 2014.
2. Under the Federal Rules of Civil Procedure, the date by which AIG is to answer or move with respect to the Complaint is June 13, 2014.
3. The parties have agreed that AIG will have 90 days to answer or move with respect to the Complaint, *i.e.*, until August 21, 2014, without prejudice to any motion or defense AIG may make or assert in such answer or motion.
4. The parties have further agreed that if AIG moves to dismiss the Complaint, Relator will have 90 days to serve his opposition.
5. AIG has not made any prior application for any extension of time in this matter.

6. Accordingly, it is hereby stipulated and agreed as follows:

- a) AIG's time to answer or otherwise move with respect to the Complaint shall be extended to and include August 21, 2014;
- b) Relator's time to oppose any motion to dismiss the Complaint shall be 90 days from the date of such motion;
- c) These extensions are without prejudice to any motion or defense AIG may make or assert in answering or moving with respect to the Complaint;
- d) This stipulation is not and shall not in the future be construed as a consent by AIG to jurisdiction in this matter.

Dated: June 11, 2014  
New York, New York

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*Attorneys for Relator Alex Grabcheski*

*Attorneys for Defendant AIG*

SO ORDERED:

George B Daniels  
Honorable George Daniels  
United States District Judge

JUN 16 2014